

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, Craig Lassig, Katie Nelson,
Tannen Maury, Stephen Muren,
Edward Ou, Timothy Evans, Chris Tuite
and The Communications Workers of
America, On behalf of themselves and
other similarly situated individuals,

Court File No. 20-cv-01302
(WMW/DTS)

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief
of Police Medaria Arradondo, in his
individual and official capacity;
Minneapolis Police Lieutenant Robert
Kroll, in his individual and official
capacity; Hennepin County Sheriff David
Hutchinson, in his individual and official
capacity; John Does 1-10, in their
individual and official capacities;

**DECLARATION OF
SARAH MCLAREN IN
OPPOSITION TO
PLAINTIFFS' MOTIONS
FOR LEAVE TO FILE
SURREPLY AND FOR
LESSER SANCTION**

Defendants.

I, Sarah McLaren, state and affirm as follows:

1. I am an Assistant County Attorney for Hennepin County.
2. In that capacity, I am one of the attorneys representing Hennepin County Sheriff David Hutchinson in the above-entitled action.
3. Plaintiffs have produced more than 11,000 pages of documents in this action.
4. The City of Minneapolis has produced more than 7,000 pages of documents in this action.

5. The State Defendants, prior to their dismissal, produced more than 1,500 pages of documents in this action.

6. On December 1, 2022, I filed Defendant Hennepin County Sheriff David Hutchinson's ("Hutchinson") Motion for Summary Judgment in this action. Also on December 1, 2022, Eleonore Sens, Chandan Khanna and Robin Legrand commenced a civil action against Hutchinson in this court styled as *Sens, et al. v. Hutchinson, et al.*, Court File No. 22-cv-3009 (DWF/DTS). A true and correct copy of the Complaint in the *Sens* action is attached hereto as Exhibit 1.

7. On February 9, 2023, I filed Hutchinson's Reply Memorandum in Support of his Motion for Summary Judgment. That same day, Plaintiffs' counsel informed me that they expected to seek leave from the Court to file a surreply memorandum. On February 13, 2023, Plaintiffs' counsel also informed me that they would also seek to file a motion under Rule 37(c) proposing an alternative sanction.

8. I informed Plaintiffs' counsel that Hutchinson would oppose both of Plaintiffs' post-briefing motions. When asked by Plaintiffs' counsel for Hutchinson's legal basis for opposing Plaintiffs' motion for an alternative sanction, I informed Plaintiffs' counsel that Plaintiffs were required to meet both the Rule 16 and Rule 37 standards for such a motion. A true and correct copy of my communications with Plaintiffs' counsel is attached hereto as Exhibit 2.

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date March 3, 2023.

/s/ Sarah McLaren
Sarah McLaren